EMS Internal Auditing Workshop

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Target Audience:

Primary: Installation staff interested in auditing an Environmental Management Systems (EMS)

Objectives:

The objective of this training session is to provide students with sufficient knowledge and tools to be able to audit an ISO-14001 environmental management system (EMS).

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EMS Internal Auditing

The specific areas covered include the following:

- EMS Auditing
- EMS Principles
- ISO-14001 Framework
- Basics of EMS Auditing
- ISO-14001 Requirements/Audit Criteria/Root Causes
- Audit Planning
- Audit Tasks
- Auditor Qualifications

In this workshop, the student will:

- Acquire the skills to prepare for, conduct and complete an EMS audit
- Learn about systems thinking and the interdependence of systems elements and what to look for in an EMS audit
- Learn the principles, structure and requirements of the ISO-14001 EMS specification
- Learn how to avoid auditing pitfalls and do root cause analyses of non-conformances

What Is Internal Auditing?

- The assessment of processes to verify that they are operating within planned arrangements
  - are procedures followed?
  - are procedures effective for their purpose?
  - do they meet the tenets of ISO 14001?
- Factual statements of observations backed by evidence
- Evaluation of processes NOT people.

EMS Internal Auditing

EMS Audits

- Not compliance audits
- Verify existence and implementation of EMS procedures and other arrangements
- Is EMS achieving its intended objectives?
- Test is against pre-established criteria
- Relies most on objective evidence
- Different in ISO 9000 (e.g., effectiveness)
- Distinguish internal and registration audits

EMS Internal Auditing

Comparison

Compliance Audit

1. Are legal requirements met?
2. Uses checklists of requirements
3. Looks for legal excursions, awareness

   of law
4. Must have knowledge of law
5. Pass/Fail

EMS Audit

1. Will the organization reach its objectives and targets with the system
2. Requires business judgement, knowledge and experience (resources, procedures, programs, effectiveness)
3. Looks at EMS implementation, commitment by management and employees
4. Must have knowledge of systems, industrial management and processes
5. Is there progress towards objectives and targets?

EMS Internal Auditing

What The EMS Auditor Needs To Know

- ISO 14001 Requirements
- Auditing Techniques and Procedures
- System Thinking and Analysis
- The System Being Audited
- Environmental Exposures and Prevention
- Societal and Governmental Expectations

EMS Internal Auditing

ISO 14001 Principles

- Focus on continual improvement of structural capacity to
  - Address compliance
  - Improve performance
  - Achieve objectives
- Integration with other systems
- Employee involvement
- Management visibility and leadership
- Preference for prevention
- Complementarity to national regulations

EMS Internal Auditing

Employee Involvement Under ISO 14001

- Awareness training
- Competence training
- Law, objectives and training at “each relevant function and level…”
- Help establish objectives and targets
- Familiarized with responsible practices
- Encouraged to promote prevention of pollution
- Given ownership and responsibility

Dependence on Employees

- Employee centered vs. expert centered
- Values cannot be dictated, they need to be adopted
- Both quality and environmental protection can best be done with employee buy-in
- Shift from staff function to line function

Employee Development with ISO 14001

- Promotes initiative
- Develops skills
- Fosters esprit de corps
- Improves communication and sense of common purpose
- Productivity
- Loyalty
- Empowerment

EMS Internal Auditing

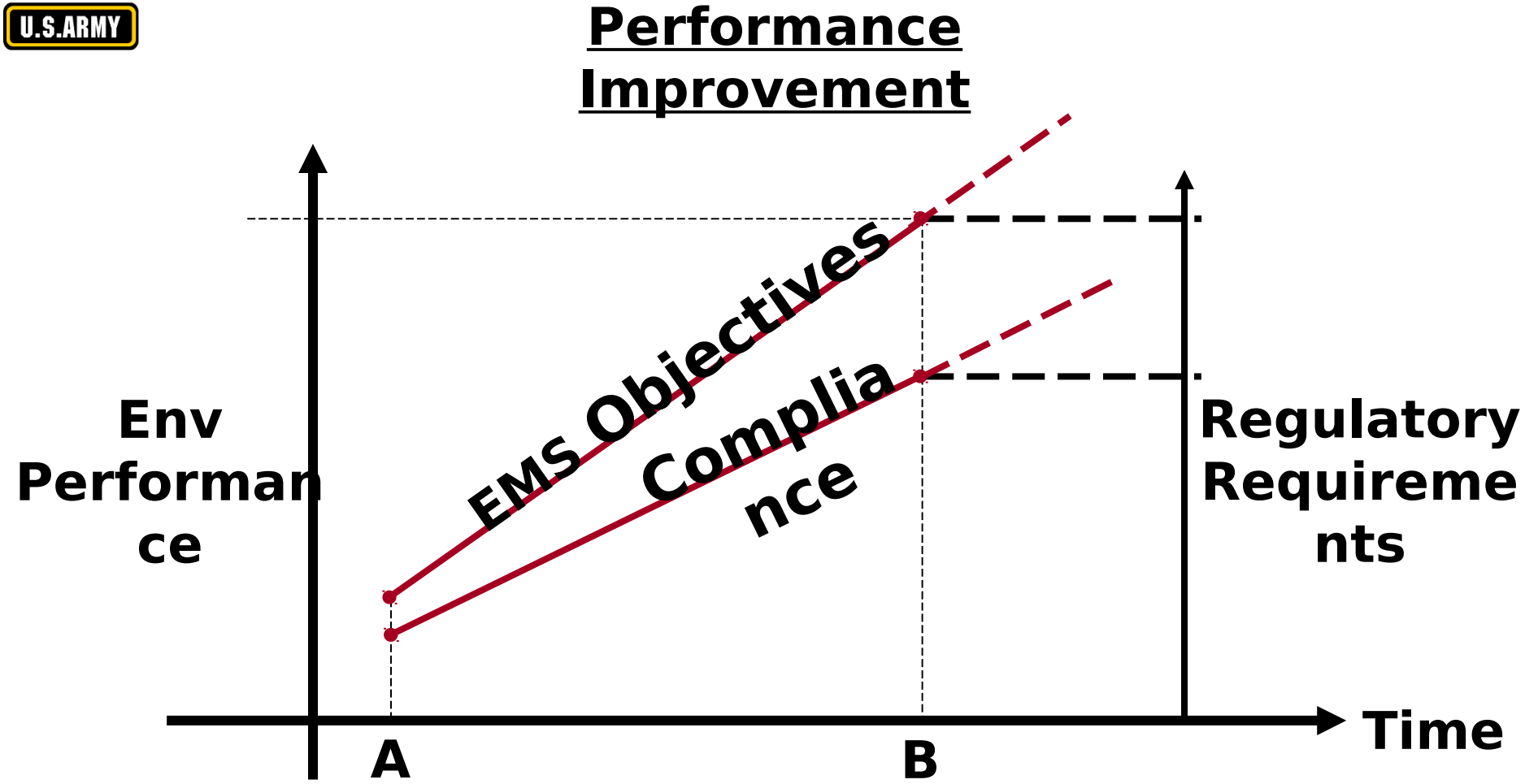
Environmental Performance

"Measurable results of the environmental management system, related to an organization's control of its environmental aspects, based on its environmental policy, objectives and targets."

- Measure of progress from a starting point and related to efforts under an EMS

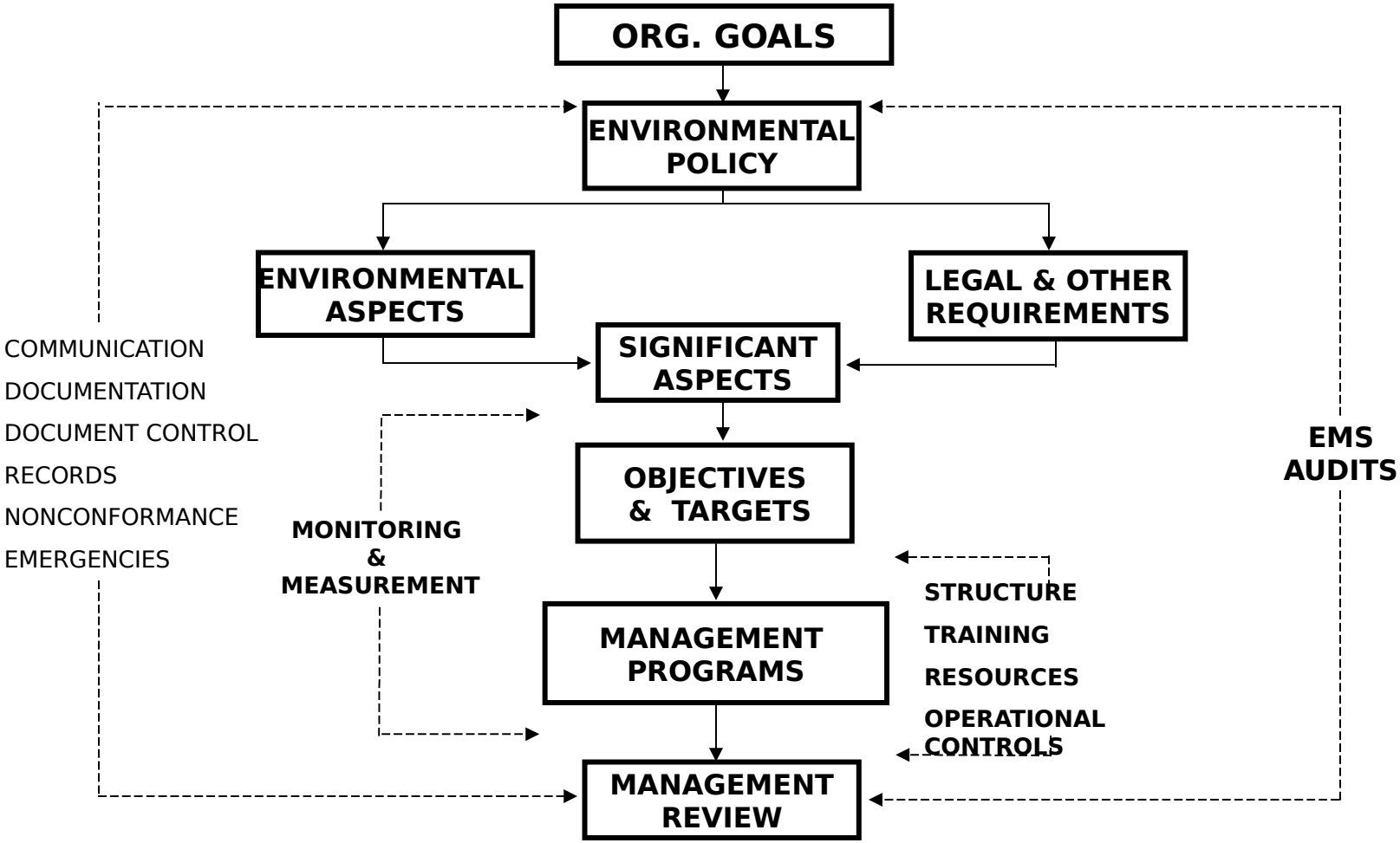
- The organization builds its own performance evaluation subsystem under its EMS

EMS Internal Auditing



EMS Internal Auditing

ISO 14001 – EMS The Systems Approach



Building Blocks of an EMS

- Organization commits to proactive, voluntary, responsible approach to environmental protection
- Much less dependency on governmental guidance and dictates
- Integrate environmental factors into business operations
- Energize through continual improvement (P-D-C-A)
- Holistic approach
- Process consistency (control)

EMS Internal Auditing

What is an EMS?

- It is a management framework to raise awareness and institute actions throughout the organization
- That makes environmental care a natural part of everyone's job
- In time, it develops an environmental culture just like the *safety* culture
- Everyone can do it naturally because it makes sense, and is a benefit to each individual as well as to the company

Basics of EMS Auditing

EMS Internal Auditing

4.5.4 EMS Audit (ISO 14001)

- The organization shall establish and maintain (a) programs and procedures for periodic environmental management system audits to be carried out, in order to:

  a) determine whether or not the environmental management system

     1) conforms to planned arrangements for environmental management including the requirements of this international standard; and

     2) has been properly implemented and maintained

  b) provide information on the results of audits to management

EMS Internal Auditing

4.5.4 EMS Audit (ISO 14001) *(continued)*

- The organization's audit program, including any schedule shall be based on the environmental importance of the activity concerned and the results of previous efforts

- In order to be comprehensive, the audit procedures shall cover the audit scope, frequency and methodologies, as well as the responsibilities and requirements for conducting audits and reporting results

EMS Internal Auditing

Definition of Audit (ISO 19011)

Systematic independent and documented process for obtaining audit evidence and evaluating it objectively to determine the extent to which audit criteria are fulfilled.

EMS Internal Auditing

Environmental Management System Audit

- Programs and procedures for periodic EMS audits (“snapshots”)
- Extent and frequency based on results of previous audits
- Results given to management for EMS review
- Performed by independent (internal or external) auditors
- Based on satisfying pre-established objective criteria

EMS Internal Auditing

Audit Disclosure

- EMS auditors are not looking for non-compliances
- EMS auditors are generally not sufficiently versed to designate non-compliances
- The EMS audit reports deal with non-conformances to the organization's own EMS
- Registration audits are not completed when the organization is not ready for registration

Collecting Audit Evidence

- Collect sufficient evidence through interviews, examination of documents and observation of activities and conditions
- Information from interviews should be verified through observations, independent sources, records and existing measurements
- Audit findings should be reviewed with auditee to establish their factual basis

EMS Internal Auditing

EMS Audit Indicators

- Adequacy of documents, procedures, programs, records
- Implementation/integration/consistency
- Progress towards objectives and targets for:
  - compliance
  - operational controls
  - reductions
  - efficiencies
  - financial returns
- Commitment by management to:
  - environmental policy
  - EMS
- Awareness and competency of employees
- Continual improvement of EMS

EMS Internal Auditing

ISO 14001 Audit Levels

- Buy-in on the Concept of EMS
- Definition (creation) of the EMS
- Deployment and Use of the EMS
  - Is it being used?
  - Are the elements current?
  - Are the elements effective?
  - Is EMS used strategically?

Auditing an ISO 14001 EMS

EMS Internal Auditing

4.2 Environmental Policy

- The environmental policy shall be defined by the top management and must:
  - Be appropriate to activities, products or services
  - Commit to continual improvement and prevention of pollution
  - Commit to compliance to law and other requirements
  - Be a framework for objectives and targets
  - Be documented, implemented, maintained and communicated
  - Be available to the public

4.3.1 Environmental Aspects

- The organization shall establish and maintain a procedure(s) to identify the environmental aspects of its activities, products or services that it can control and over which it can be expected to have some influence in order to determine those which have or can have significant impacts on the environment. The organization shall ensure that the aspects related to these significant impacts on the environment are considered in setting its environmental objectives.
- The organization shall keep this information up to date.

3.3 Definition of "Environmental Aspect"

- Any element of an organization's activities, products, and services that can interact with the environment.
- A significant environmental aspect is an environmental aspect which has or can have a significant environmental impact.
- Must include regulatory requirements.
- Can also include non- regulated attributes (e.g., water and energy consumption, carbon dioxide, product characteristics, employee travel).

EMS Internal Auditing

Identifying “Significant Aspects”

- Environmental Concerns
  - Scale of the impact
  - Severity of impact
  - Probability of occurrence
  - Duration of impact
- Business Concerns
  - Potential legal exposure
  - Difficulty of changing the impact
  - Cost of addressing impact
  - Effect of change on other activities/processes
  - Concerns of interested parties
  - Effect on public image

4.3.2 Legal and Other Requirements

The organization shall establish and maintain a procedure to identify and have access to legal and other requirements to which the organization subscribes directly applicable to the environmental aspects of its activities, products or services.

Examples of other requirements:

1. ICC Charter for Sustainable Development
2. Chemical Industry Responsible Care®
3. CERES Principles
4. U.S. EPA's Green Lights Program
5. Corporate policy

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Commit to Compliance

- EMS must include procedures to attain compliance
- Over time, continual improvement is likely to take organization beyond compliance
- Compliance is NOT a requirement for registration
- ISO 14001 is a consistent regimen to attain performance goals through continual improvements

EMS Internal Auditing

Legal Compliance

- Commitment to Compliance in Policy
- Procedures to Identify and Determine Applicability of Legal Requirements
- Setting Objectives and Targets for Compliance
- Creating Programs to Achieve Objectives and Targets
  - Training of Employees
  - Resources
  - Operational Controls
  - Line Management Ownership
  - Employee Responsibility
- Periodic Check of Compliance Status
- Management Review to Propel Continual Improvements

4.3.3 Objectives and Targets

- The organization shall establish and maintain documented environmental objectives and targets at each relevant function and level within the organization.
- When establishing and reviewing its objectives, an organization shall consider the legal and other requirements, its significant environmental aspects, its technological options and its financial, operational and business requirements, and views of interested parties.
- The objectives and targets shall be consistent with the environmental policy, including the commitment to prevention of pollution.

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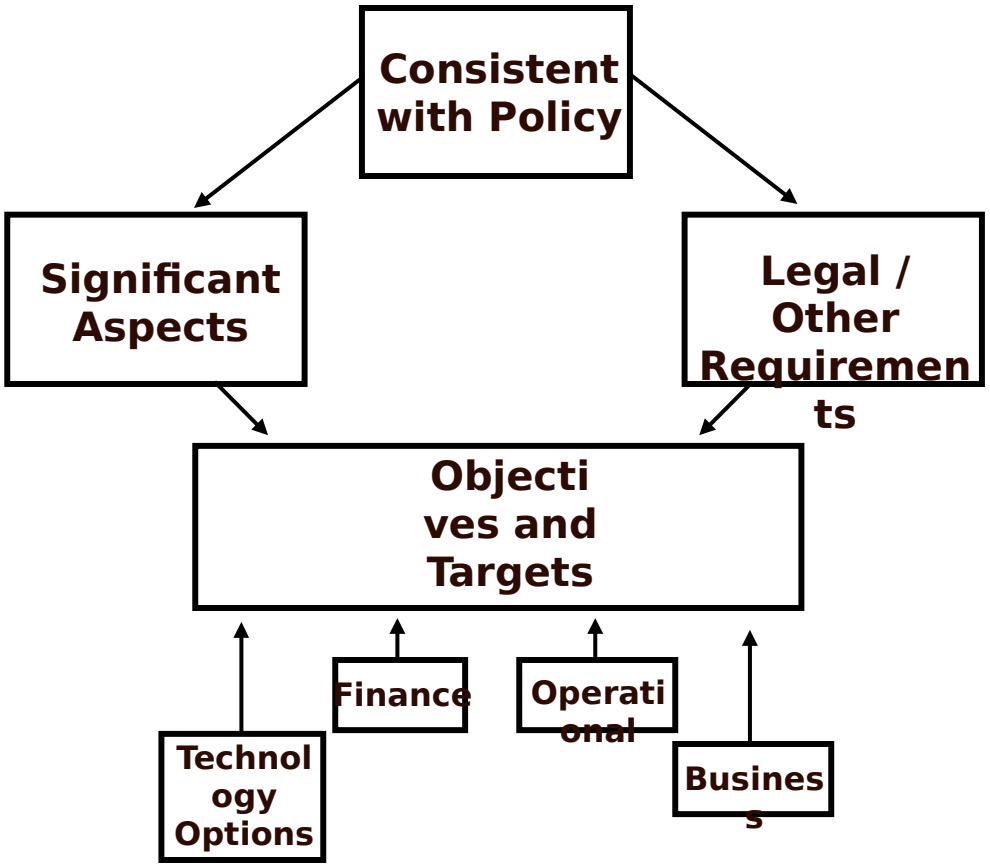
Set Objectives and Targets

Objectives

- Reduce energy use by 30% in 2003
- Improve compliance with wastewater discharge permit limits in 2003
- Reduce use of hazardous chemicals by 40% in 2003



Targets

- Reduce electricity use by 10% in maintenance
- Reduce violations by 50%
- Reduce use of high-VOC paints by 25% and, of herbicides by 60%

4.3.3 Objectives and Targets *(continued)*

- "…at each relevant function and level…"
  - Distributed to employees
  - Establishes ownership
- Set for all significant aspects (including legal and other requirements)
  - May be set to "maintain"
- Views of interested parties "to be considered"
- May be tied to employee performance plan
- Employees input their views and knowledge for setting objectives and targets
- No requirement to communicate success or failures

4.3.4 Environmental Management Program(s)

- The organization shall establish and maintain (a) program(s) for achieving its objective and targets

- It shall include:
  a) Designation of responsibility for achieving objectives and targets at each relevant function and level
  b) The means and time-frame by which they are to be achieved

4.4.6 Operational Control

- Facility/Site needs to identify:
  - Operations and activities linked to identified significant environmental aspects and to establish procedures to control them
  - Operating criteria and maintenance
  - Procedures relating to significant environmental aspects of goods and services used by the facility/site

EMS Internal Auditing

Operational Control

- This is where the “rubber meets the road”
- Employees in charge of controls
- Compliance to law depends on controls
- Controls designed to maintain compliance
- Involves technology, engineering, procedures, process control
- Competence is critical
  - Technical and legal
- Backups and redundancies may help

EMS Internal Auditing

4.4.1 Structure and Responsibility

- Roles, responsibility and authorities
- Defined, documented, communicated
- Management shall provide resources
  - Human, technological, financial
- Management representative
  - Ensures EMS requirements are established, implemented and maintained
  - Reports to top management for review

4.4.2 Training, Awareness and Competence

- All employees whose work may create a significant environmental impact must get appropriate training
- System for awareness training of managers and employees "…at each relevant function and level…"
  - Importance of conforming to the EMS
  - Significant environmental impacts of their job tasks
  - Potential consequences of departure from operating procedures
- Requires evidence of competence (either education, training or experience) for personnel performing tasks which can cause significant environmental impacts

4.4.7 Emergency Preparedness and Response

- Establish and maintain procedures to respond to emergency situations
- Revise these procedures (if necessary) after occurrences
- Test procedure periodically

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4.5.1 Monitoring and Measurement

The organization shall establish and maintain documented procedures to monitor and measure on a regular basis the key characteristics of its operations and activities…

- Performance
- Operational Controls
- Objectives and Targets
- Compliance

4.5.1 Monitoring and Measurement

- Monitoring equipment shall be calibrated and maintained and records of this process shall be retained according to the organization's procedures

- The organization shall establish and maintain a documented procedure for periodically evaluating compliance with relevant environmental legislation and regulations

EMS Internal Auditing

4.4.3 Communications

- Policy communicated to employees and available to the public
- Implicit in training
- At “every relevant level and function”
  - Targets, legal, awareness, competence, responsibility
- Procedures for internal communication
- Communicate relevant requirements to suppliers and contractors on significant aspects of goods and services

EMS Internal Auditing

4.4.3 Communications

- Procedures to receive and respond to external communications
- Consider communicating significant aspects
- U.S. regulations require vast disclosure
  - Clean Water Act (DMRs)
  - Resource Conservation Recovery Act
  - EPCRA (TRI)
  - Emergency plans
  - Permits

EMS Internal Auditing

Non-Conformance, Corrective and Preventative Action

- Requires procedures defining responsibility and authority for
  - Handling and investigating non-conformances to the EMS
  - Taking action to mitigate impacts
  - Initiating and completing corrective action
  - Initiating and completing preventive action
- Requires changes in procedures based on corrective and preventive action
- A non-compliance that is being appropriately addressed by the EMS is not a non-conformance

EMS Internal Auditing

EMS Audit

- Programs and procedures for periodic EMS audits (“snapshots”)
- Extent and frequency based on results of previous audits
- Results given to management for EMS review
- Performed by independent (internal or external) auditors
- Based on satisfying pre-established objective criteria

EMS Internal Auditing

Documentation, Documents, Records

- Documentation: *Helpful information not used to run EMS (e.g., description of the system)*
- Documents: *Written instruments used to run the EMS (e.g., policy, procedures)*
- Records: *The outputs from running the EMS (e.g., training records, measurements, EMS audit reports, management review minutes)*
- Documented procedure = Written procedure

EMS Internal Auditing

4.4.4 EMS Documentation

- Facility/Site must establish an information management system that:
  - Describes the core elements of EMS and their interaction
  - Provides “roadmaps” to related environmental documents
- Facility/Site EMS Manual can meet this requirement, though not required by 14001

EMS Internal Auditing

4.4.5 Document Control

- Facility/Site must have procedures for controlling documents required to implement EMS so that:
  - They can be located
  - They are periodically reviewed, revised and approved
  - Current versions of relevant documents are available at all locations where operations essential to the EMS are performed
  - Obsolete documents are removed or appropriately stored
- Opportunity to integrate with ISO 9000 document control

EMS Internal Auditing

4.5.3 Records

- Establish and maintain procedures for the identification, maintenance and disposition of environmental records
  - Legible, identifiable and traceable to the activity, product or service
  - Provide for storage, retrieve-ability, and retention time

EMS Internal Auditing

4.6 Management Review

- Management shall, at appropriate intervals, conduct reviews of the EMS in order to ensure its effectiveness, adequacy and suitability
- Review must be documented to include:
  - Reviewing progress against environmental objectives, targets and against performance goals
  - Audit findings
  - An evaluation of EMS effectiveness, adequacy and suitability
  - The environmental policy and the need for changes
- Consider the management review process during implementation of the EMS

EMS Internal Auditing

4.6 Management Review

- Management provides basis for continual improvement
- Management has the power and responsibility to determine whether the EMS is effective, adequate and suitable
- Management representative makes sure all inputs are available for review
- Management representative ensures that review decisions are incorporated to improve the EMS
- Once top management is defined, they are required to conduct the review

ISO 14001 Registration

EMS Internal Auditing

Registration Process

- Sometimes called “certification”
- Assessment and periodic surveillance audit by an accredited registrar
- Registrars audit and evaluate the adequacy and implementation of EMS
- If a company’s system conforms to ISO 14001, the registrar issues a certificate of registration
- A company’s system is registered, not its performance or products

EMS Internal Auditing

Registration Integrity

- The conformity assessment system is designed and operated to ensure the integrity of registration. This is accomplished through:
  - Accreditation of registrars
  - Accreditation of course providers
  - Certification of EMS auditors
- The criteria for these determinations is based on ISO guides and standards as well as national requirements

EMS Internal Auditing

Choosing a Registrar

- Accredited
- Environmental expertise
- Systems expertise
- Familiar with your industry

Choosing a Registrar

- For multiple-site registrations, consider using one registrar
- Interview registrars on their interpretation of standard
- Ask for their registration criteria
- It is a conflict for registrars to consult

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EMS Internal Auditing

Negotiating Contract Issues

- Single-site vs. multiple-site approaches
- Frequency of surveillance audits and reregistration audits
- Access to privileged documents
- Record/documents retention by registrar
- How to manage discovered non-compliance

Registration Process

- Confidentiality
  - Assessment body agrees to maintain confidentiality of organization data
  - May include nondisclosure agreement
  - This may not protect against subpoenas and other information requests

Registration

- Registrar will expect to find procedures showing what you do, and records demonstrating that you implemented the procedures
  - Will not take your word that something has been done

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Registration

- ISO 14001 will cover ***entire*** organization
- Registration audits will be conducted on a sampling basis
  - Level of detail in large measure will be dependent on confidence in system
  - Will look closely at audit and corrective action programs

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Registration

- Publicity
  - Make register publicly available
  - Update register periodically
  - Display registration document
  - Use assessment body’s symbol or logo as authorized -- Typically not on products

EMS Internal Auditing

Registration

- Withdrawal / Cancellation / Suspension
  - Organization improperly uses symbol or logo
  - Program changes are not accepted
  - Organization fails to implement changes in standards
  - Surveillance discovers major non-conformance, and organization fails to take adequate corrective action
  - Organization fails to pay

EMS Internal Auditing

Registration Strategy

- Develop criteria for registration of sites
- Develop criteria for selecting registrars
- Determine registration unit
- Develop self-assessment plan for preparation
- Consider legal strategy for audits
- Bring corporate business auditing into plan
- Determine registration priorities
- Prepare registration support plan

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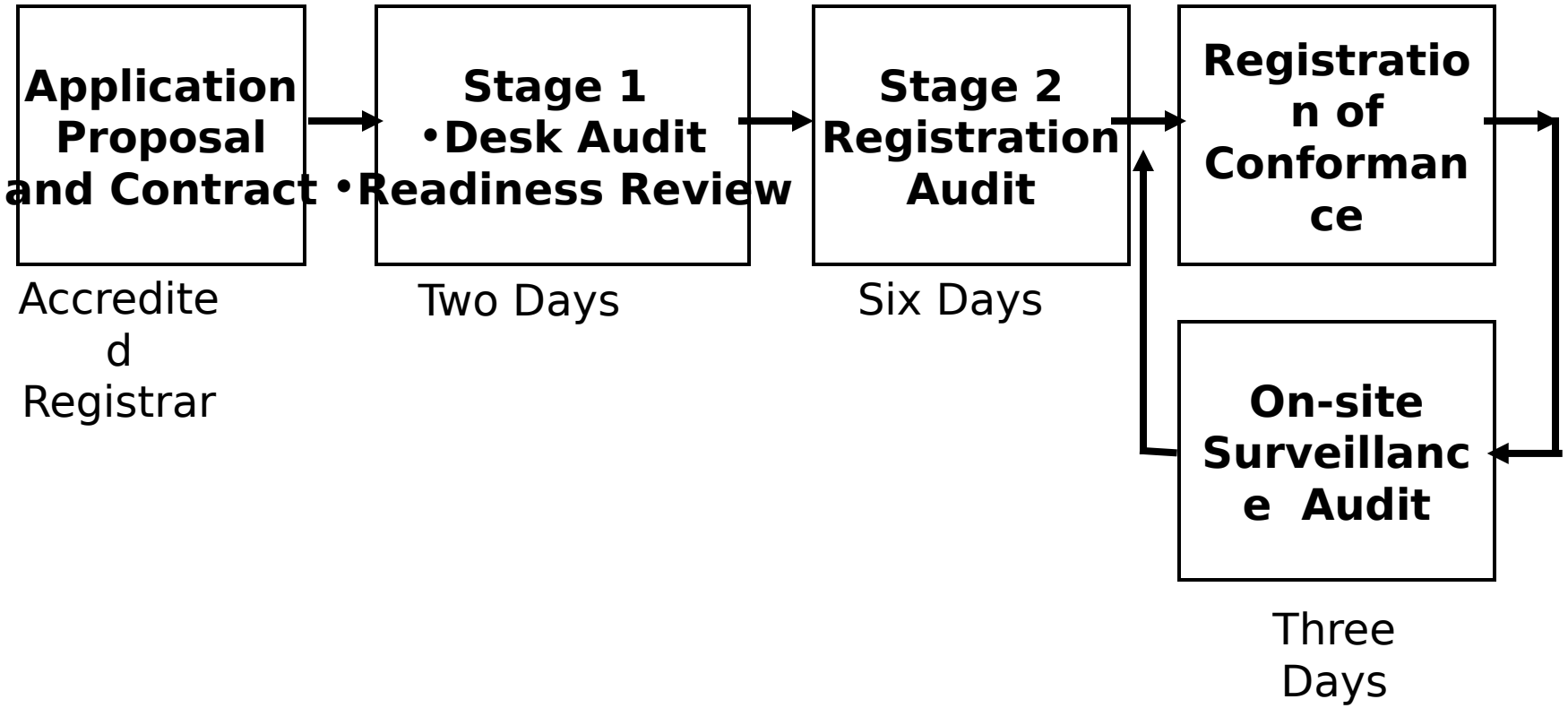
ISO 14001 Registration Process



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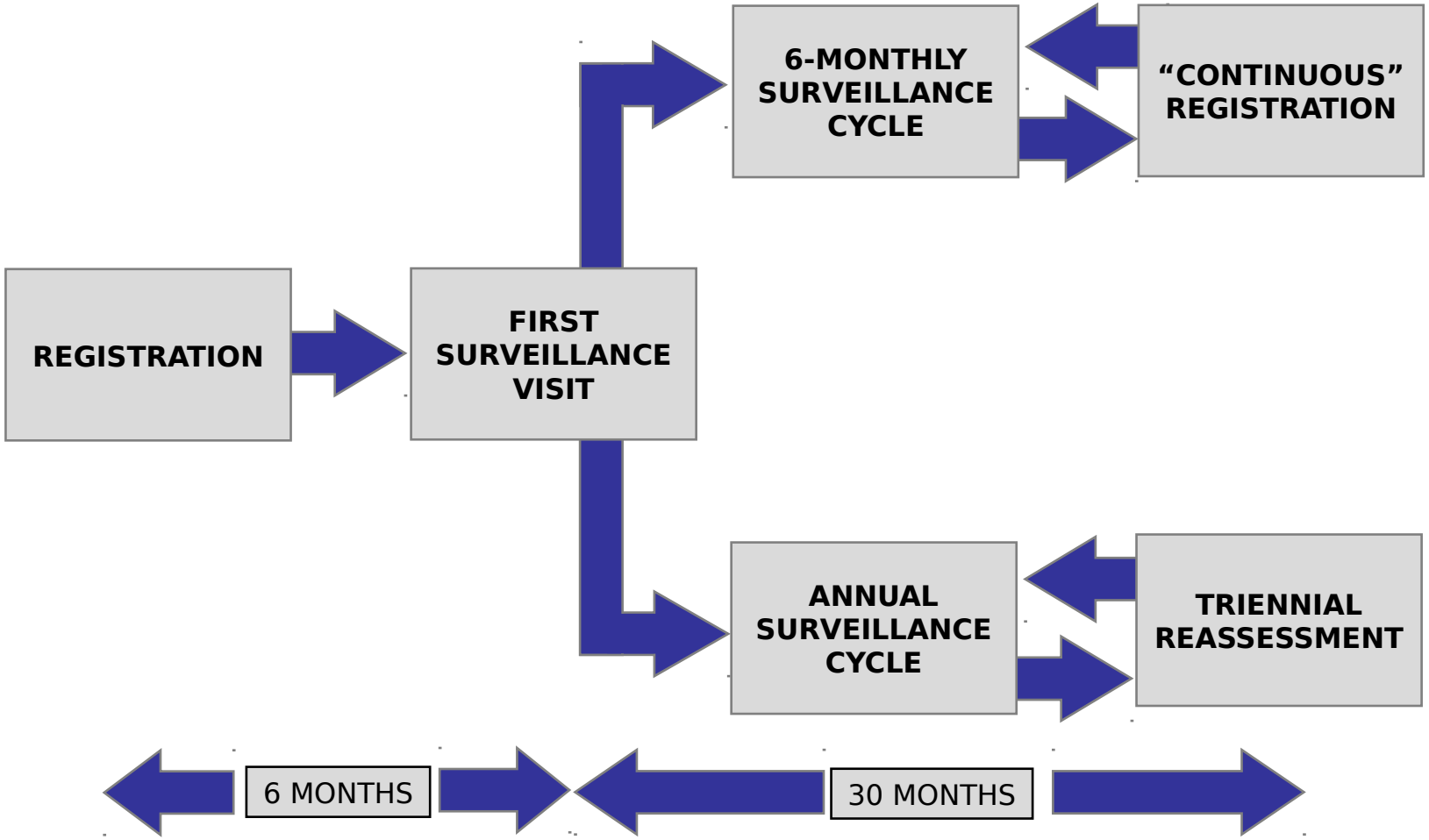
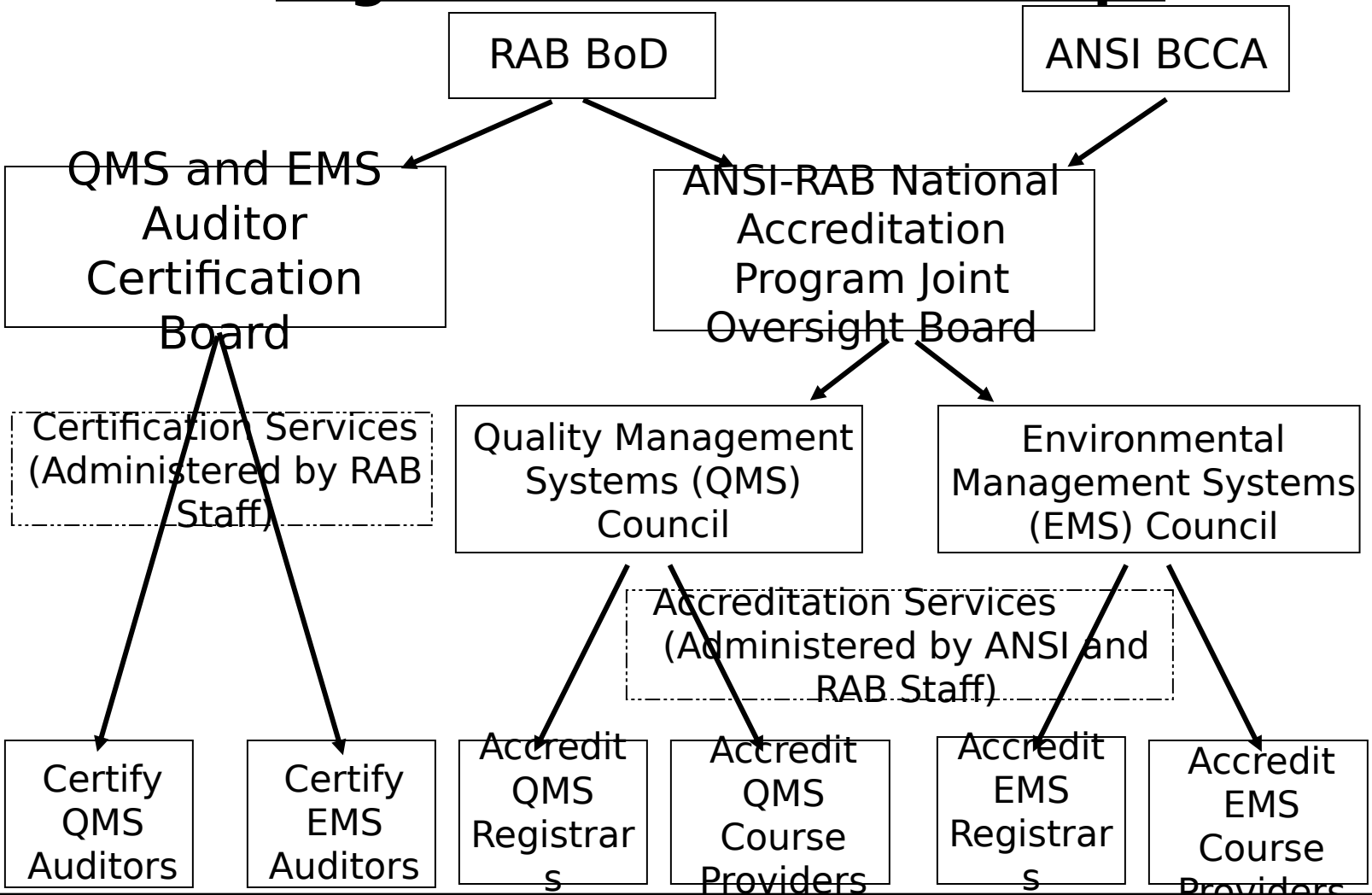
ISO 14001 Registration Maintenance Process



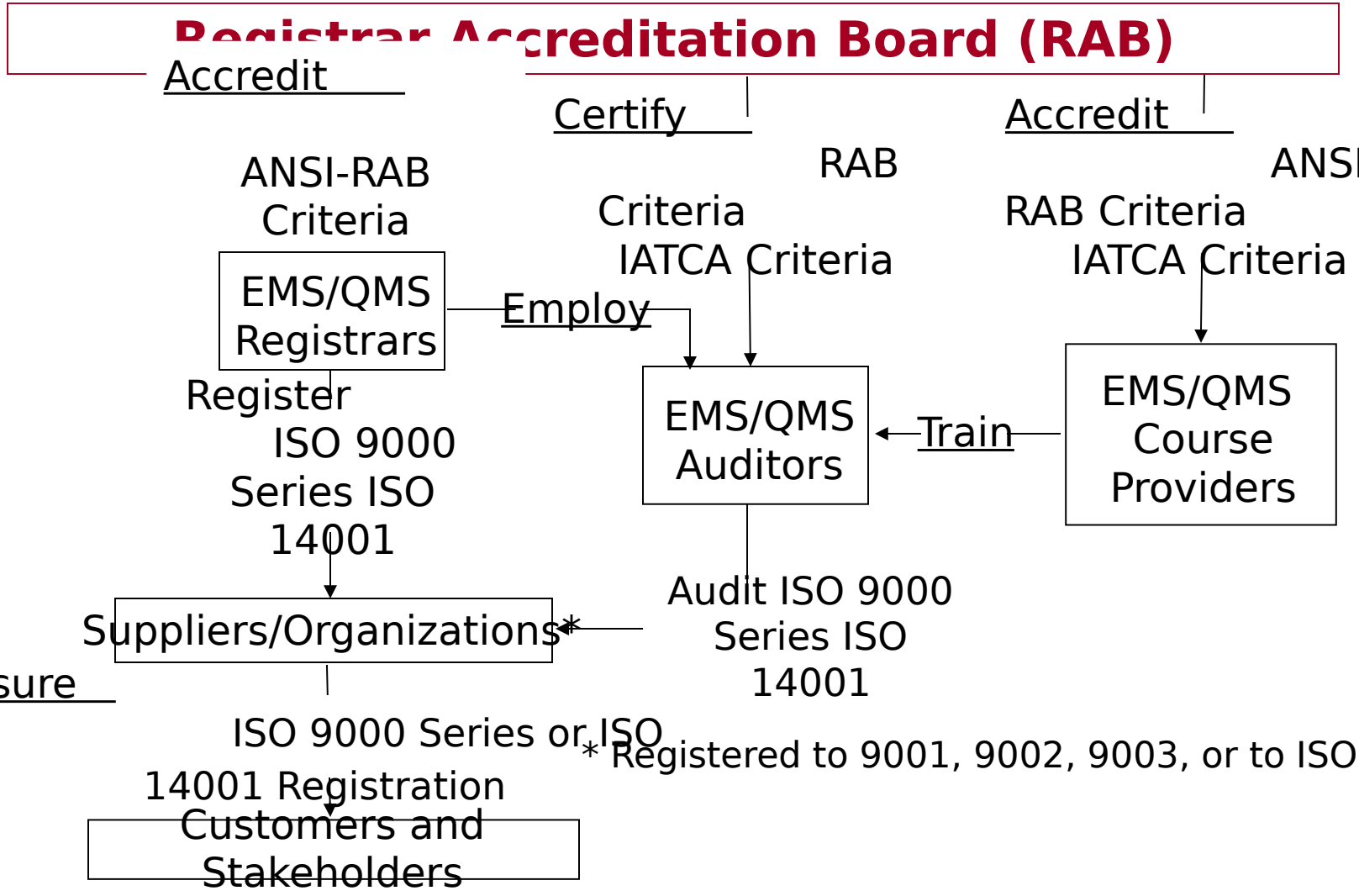
EMS Internal Auditing

Registrar Accreditation Board Organizational Relationships


RAB BoD
ANSI BCCA
QMS and EMS Auditor Certification Board
ANSI-RAB National Accreditation Program Joint Oversight Board
Certification Services (Administered by RAB Staff)
Quality Management Systems (QMS) Council
Environmental Management Systems (EMS) Council
Accreditation Services (Administered by ANSI and RAB Staff)
Certify QMS Auditors
Certify EMS Auditors
Accredit QMS Registrars
Accredit QMS Course Providers
Accredit EMS Registrars
Accredit EMS Course Providers

EMS Internal Auditing

Registrar Accreditation Board (RAB)



EMS Internal Auditing

Trace Forward Audit Approach

- Activity
- Aspect
- Legal Requirement
- Significant Aspect
- Objective(s) & Target(s)
- Management Program
- Operational Controls
- Performance Indicators
- Management Review
- Records

Collecting Audit Evidence

- Collect sufficient evidence through interviews, examination of documents and observation of activities and conditions
- Information from interviews should be verified through observations, independent sources, records and existing measurements
- Audit findings should be reviewed with auditee to establish their factual basis

Conducting Internal Audits

- Be sure your questions are understood
- Actively listen to the answers
- Ask follow-up questions
  - Until the question is understood
  - Until the answers are clear
- Ask related questions
  - How were you trained in this process?
  - Can you show me where the records are kept?
  - How do you know this is the latest version?
  - For “when applicable” or “as required” statements: Who can make that decision?

Conducting Internal Audits

Turning an audit into a disaster

- Be confrontational, argumentative, overbearing, and opinionated
- Dispense advice or tell “war stories”
- Accuse or attack individuals
- Look for victims and scapegoats
- Be insincere
- Interrupt, draw premature conclusions, make judgments
- “Interpret” procedures
- Deviate from the audit agenda
- Negotiate deals and predict outcomes

EMS Internal Auditing

How to be Audited

- Be prepared but not scripted
- Take the time to review what you are doing compared to the applicable procedures
- Be sure monitoring equipment in your control is in current calibration
- Be sure all records are up to date and forms are current
- Ensure that records are available and accessible

EMS Internal Auditing

How to be Audited

- Answer all questions briefly and truthfully
  - If you do not know defer to someone who does
- Don’t volunteer more than was asked
- Do help the auditor understand the answers
- Never argue or become confrontational

EMS Internal Auditing

Daily Team Meetings

Each Team Member

- Gives a “mini” report on day’s activities
- Discusses significant observations
- Reports whether on schedule
- Reports on findings to be written
- Asks others to check things out in own area of responsibility
- Discuss observations requiring immediate action
- Write as much as possible each day
- Ask for lead auditor review on findings and CARs

Wasting an Auditor's Valuable Time

Given

- Auditors rarely have sufficient time to do all they would like to do

Time Wasters

- Long unnecessary time in pre-audit conference
- No plan of attack
- Lengthy presentations
- Interviewee not available; interviewing the wrong person; conducting business as usual during interviews
- Touring the area; contrived setups
- Documenting too many of the same type of finding

Lack of Preparedness

Individuals are not prepared to perform audits due to:

- Lack of management awareness and commitment
- Improper selection of auditors
- Inadequate training of auditors
- Insufficient funding and resources
- Insufficient planning and preparation

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EMS Internal Auditing

Undesirable Auditor Attributes

- Argumentative and opinionated
- Inflexible and jumps to conclusions
- Easy to influence (believes everything)
- Lazy, lacks desire, poor planner
- Non-communicative
- Insincere
- Devious
- Nonprofessional

Desirable Auditor Attributes

- Knowledge
  - Of management principles and practices
  - Of requirements
  - Of techniques
- Sound judgment
- Patience and interest
- Communicates at all levels
- Good listener
- Honest and courteous
- Organized
- Professional

Audit Reports

Documentation of Findings:

- What did the written procedure require?
- What was actually happening?
- What evidence supports the finding?
- What answers were you given for the deviation?
- Was there a clear cause?
- Did the responsible manager acknowledge the finding?

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Categorizing EMS Non-conformances

Category A (CRITICAL)

- When the total requirement or a significant part of the requirement within a given ISO 14001 criterion is violated or deficient
- A single critical EMS non-conformance
- Failure to implement the environmental policy

Categorizing EMS Non-conformances

Category B (MAJOR)

- When a significant number of minor nonconformances are found against any one given requirement

Category C (MINOR)

- When a single nonconformance is found
- Significant observation or concern

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EMS Internal Auditing

Corrective Action

- Each Finding requires a Corrective Action Request (CAR)
- Repeated findings for the same non-conformance should be grouped on one CAR
- Findings should be categorized

EMS Internal Auditing

Corrective Action

- Send the CAR addressed to the responsible individual
- Give adequate time for response
- Follow up to ensure the CAR is given priority
- Do not close the CAR until due diligence is done

EMS Internal Auditing

Closing the Loop

- Are all CAR's closed?
- Was the corrective action effective?
- Was root-cause-analysis performed when indicated?
- Do procedures need to be revised?
- Do follow-up audits need to be scheduled?
- Are any trends evident from the audits?

EMS and Self Declaration

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Target Audience:

Primary: Installation staff interested in implementing Environmental Management Systems (EMS)

Objectives:

1. **Provide general awareness of EMS self declaration requirements**
2. **Provide awareness of general Army approach**
3. **Facilitate discussion of EPAS specific requirements**

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EMS Internal Auditing

Self Declaration Background

- Section 1 (Scope) of ISO 14001 mentions the possibility of *self-determining* and *self-declaring* conformance with the ISO 14001 standard.
- The ISO 14000 series of standards provide no formal guidance on the *self-declaration* process, nor any details about what kind of statement an organization can make.
- *Self-declaration* simply implies that an organization that has implemented ISO 14001 asserts that it conforms to the standard, without the involvement of certification bodies.
- Army developed an agency wide protocol to self declare compliance with EO 13148.

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EMS Internal Auditing

Self Declaration Driver

- Office of the Federal Environmental Executive (OFEE) has the responsibility of EMS implementation under EO 13148.
- Protocol developed by EO 13148 Interagency Environmental Management Workgroup.
- Initial memorandum on EMS Agency Self-Declaration Protocol for Appropriate Federal Facilities (Protocol) dated 10 Sep 03.
- Formal transmittal 27 Jan 04 to Agency Environmental Executives.
- Army will use it for declaring compliance with EO 13148 and conformance to ISO 14001 – 2 milestones.
- Deadline for implementation of the Protocol is 31 Dec 04.

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EMS Internal Auditing

Schedule

- Initial draft developed in early 2003.
- Speculation that a protocol would not be required.
- No work for about a year.
- Current draft distributed by ODEP 12 October – Comments due 23 November 04.
- Signed out by DASA(ESOH) December 04.

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EMS Internal Auditing

Purpose of the Protocol

- Credible and verifiable process by which Federal facilities comply with EO 13148 requirements for EMS Implementation.
- Document a standardized business process used by Army installations to self declare.
- Establish and maintain procedures for periodic EMS audits.
- Ensure that accepted EMS principles are being implemented.

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EMS Internal Auditing

Key Self Declaration Requirements

- Direction on the ues of an Evaluation Guide.
- Direction on the frequency of self declaration internal and agency evaluations.
- Qualifications of independent reviewers.
- Direction on documenting and using the results of the evaluation.
- Schedule for reviewing the Self Declaration Procedure.
- Procedure shall be established and communicated NLT 31 Dec 2004.
- Include guidance on state incentive initiatives fo

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EMS Internal Auditing

Army Approach

- ODEP will “own” the procedure and update as necessary, but at least annually.
- Use the Self-Declaration protocol to add credibility to the entire auditing process – not just 6 metrics.
- Leverage EPAS assessment process for internal and external auditing.
- Some EPAS business process changes will have to take place over the coming years.
- Installations can base self-declaration on either the internal or external audit results.

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EMS Internal Auditing

Two Tracks for Self Declaration

Self-declaration applies to two EMS milestones

1. EO 13148 compliance - six DoD metrics are completed.
   - EQR is the mechanism to “state” compliance with EO
2. Full conformance with ISO 14001 is achieved.
   - Declaration approved by the Commander
   - Forwarded through Chain of Command to ODEP
   - Update EQR
   - Self Declare based on either internal or external EPAS audit

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EMS Internal Auditing

The Army Procedure for Self-Declaration

Draft Army procedure is a 4 step process.

Step 1. Determining Organizational EMS Requirements

Step 2. EMS Audit Planning (scope, frequency, protocols, auditor quals, ID team)

Step 3. Conducting and Documenting the EMS Audit (audit tasks, EPAS software, documenting results)

Step 4. Reporting EMS Audit Results (determining self declaration status, communicating results)

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EMS Internal Auditing

Hot Topics!

- Auditor Training Requirements.
- EPAS software requirement for documentation.
- Use Active Army Supplement as the EMS Protocol.
- Length – Level of Detail.

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EMS Internal Auditing

Summary

- Discussed the general requirements of the EMS self declaration protocol
- Discussed the Army's approach to self declaration

Resources

1. Provide general awareness of EMS self declaration requirements
2. Awareness of general Army approach
3. Facilitate discussion of EPAS specific requirements

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EMS and EPAS

Instructor(s): Nina Scala
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US Army Environmental Center
Aberdeen Proving Ground
410-436-7073

Target Audience:

Primary: Installation personnel that are involved in EMS implementation.

Objectives:

1. **Provide background information on EPAS/EMS integration**
2. **Provide the EMS auditing plan for future years**
3. **Explain how EPAS software will be modified to include EMS auditing capabilities**

Tom

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EMS Internal Auditing

Background

- The Army will conduct external EMS audits via the EPAS program
- EMS audits assess against the protocol contained in the *Active Army Supplement* to the *TEAM Guide*
- EMS audit teams <u>will use the EPAS software</u> to conduct and document both external and internal EMS audits

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EMS Internal Auditing

EPAS Background

- External Assessments
  - Conducted by a team of environmental experts independent of the installation (CHPPM or contractor)
  - Conducted approximately every 3 years, depending on AERM
- Internal Assessments
  - Conducted by installation personnel (typically environmental staff)
  - Conducted on an annual cycle

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EMS Internal Auditing

EPAS Software

- External Assessments
  - Software used to collect data, print reports, and facilitate planning and monitoring of corrective actions
- Internal Assessments
  - In December 2003, Installations required to use software to record Internal Assessments upon successful training
  - Installation training began in FY05

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EMS Internal Auditing

EPAS Software

- Protocols/requirements
  - TEAM Guide
  - Army supplement (incl EMS)
  - State protocols
- Facility-Activity-Task types
- Standardized Libraries
  - Summary Condition Statements
  - Corrective Actions
  - P2 Alternatives

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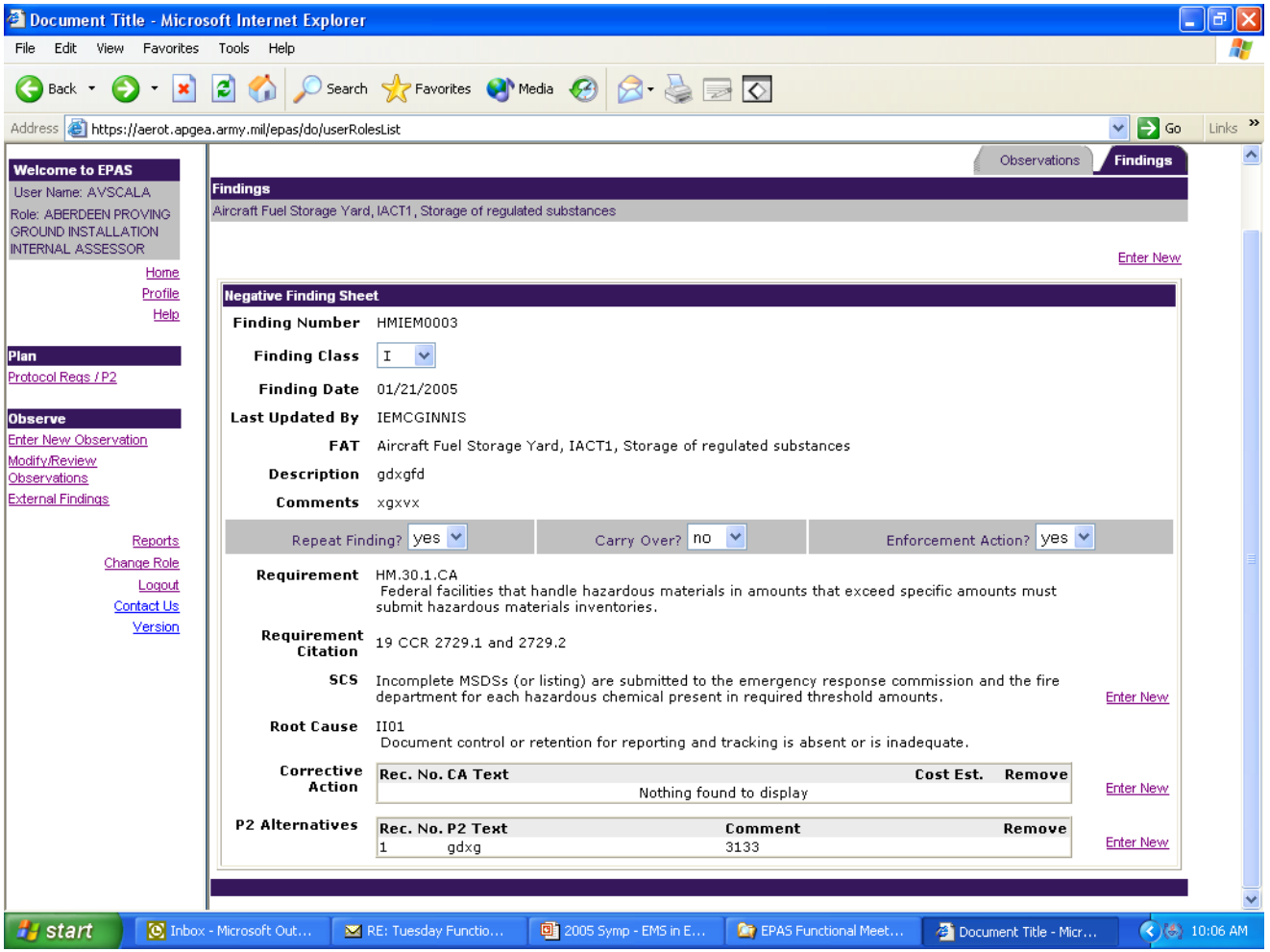
EMS Internal Auditing

EPAS Software



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EMS Internal Auditing

EMS Audit Vision

- Army moving toward environmental performance versus compliance
  - EMS-focused audits of volunteer installations in FY05
  - EMS-focused audits at identified installations by FY08
  - Audit coverage is 100% EMS-focused by 4th qtr FY09
- Compliance audits decline as EMS audits increase
- EMS audits contain some compliance checks
- Complete assessment strategy in development

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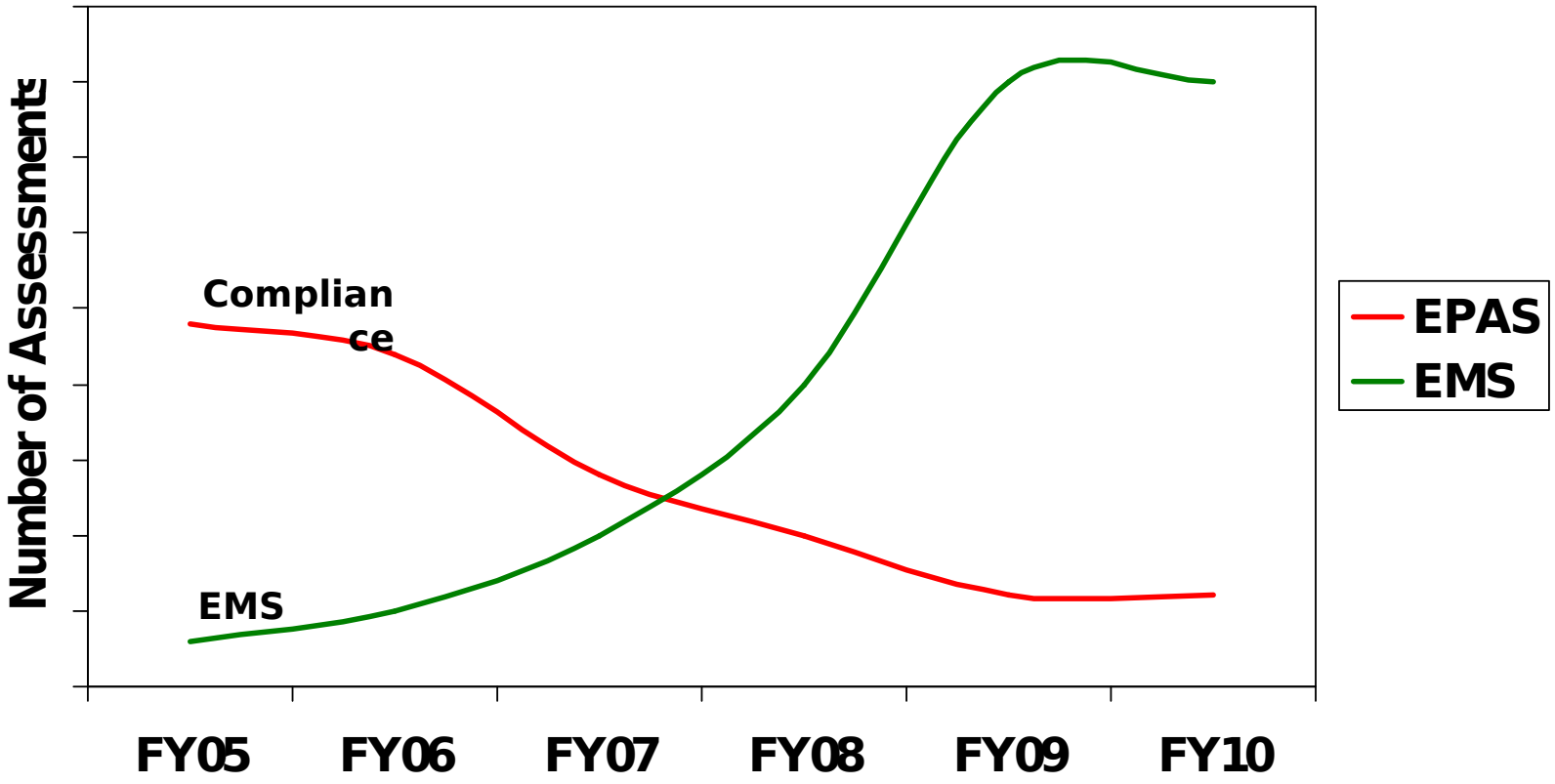
EMS Internal Auditing

EMS Audit Vision



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EMS Internal Auditing

EMS Audits FY2005

- Internal and External EMS Audits to begin
- Scope only includes EMS elements in place
- Scheduled External EMS Audits
  - Umatilla
  - Fort Stewart
  - Fort Bragg

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EMS Internal Auditing

EMS Audits FY2006-FY2009

- Internal and External EMS audits to continue
- All ISO elements included in EPAS software
- Scope should include
  - Six DoD metrics
  - Those elements in place at the installation

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EMS Internal Auditing

EMS Audits FY2010 and beyond

- External audits of all Appropriate Facilities conducted every three years
- Internal audits continue annually
- Scope includes all ISO elements (in EPAS software)

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EMS Internal Auditing

EMS in EPAS Software

- EPAS software contains EMS protocols
- EPAS software currently does not support EMS findings
  - Need new fields for conformance findings
  - Need new standardized EMS report
- However, software may be used, and output modified, to reflect EMS requirements

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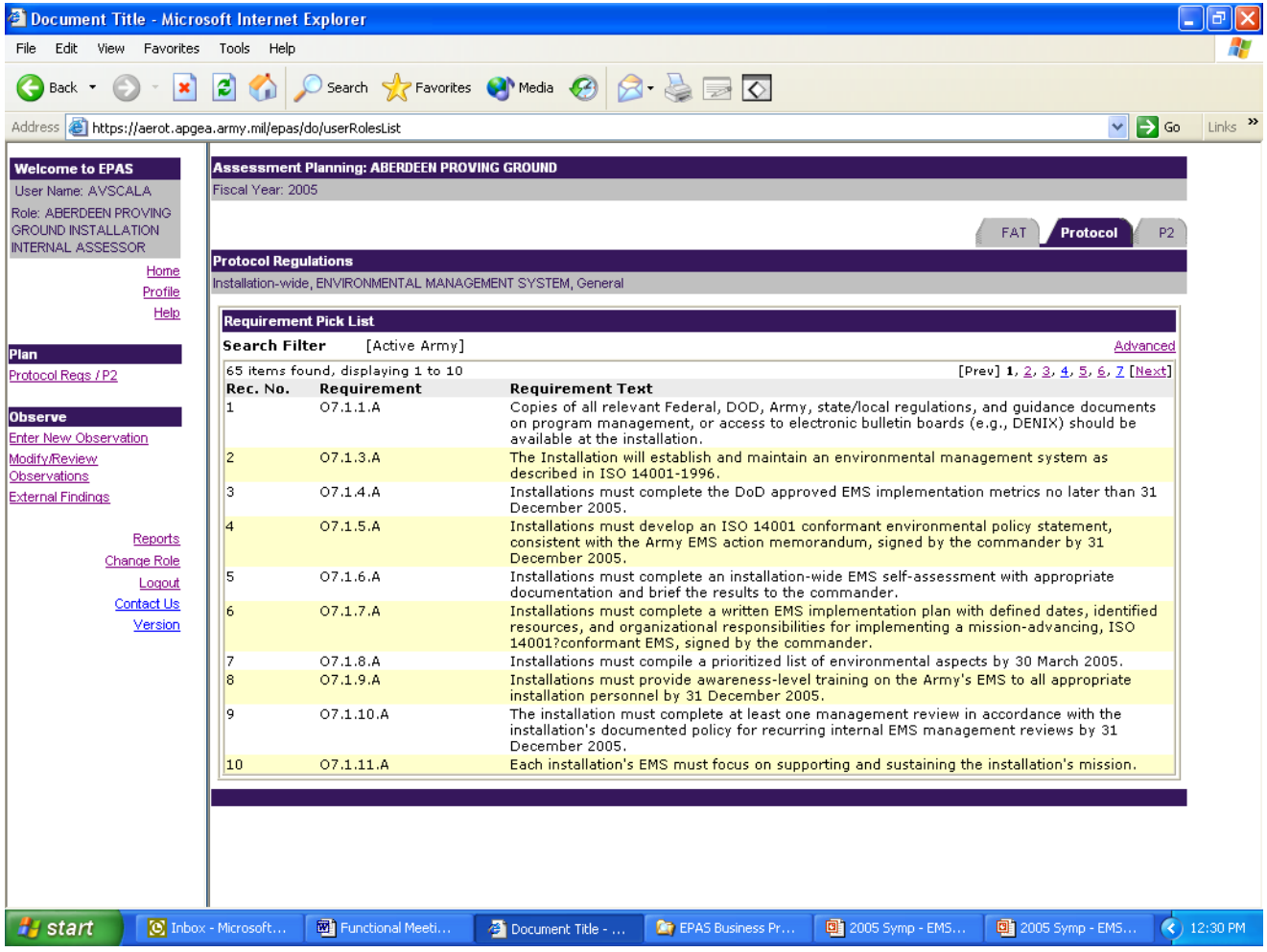
EMS Internal Auditing

EMS Protocols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Role: ABERDEEN PROVING GROUND INSTALLATION INTERNAL ASSESSOR
Home
Profile
Help
Plan
Protocol Reqs / P2
Observe
Enter New Observation
Modify/Review Observations
External Findings
Reports
Change Role
Logout
Contact Us
Version
Assessment Planning: ABERDEEN PROVING GROUND
Fiscal Year: 2005
FAT
Protocol
P2
Protocol Regulations
Installation-wide, ENVIRONMENTAL MANAGEMENT SYSTEM, General
Requirement Pick List
Search Filter [Active Army]
Advanced
65 items found, displaying 1 to 10
[Prev] 1, 2, 3, 4, 5, 6, 7 [Next]
Rec. No. Requirement Requirement Text
1 O7.1.1.A Copies of all relevant Federal, DOD, Army, state/local regulations, and guidance documents on program management, or access to electronic bulletin boards (e.g., DENIX) should be available at the installation.
2 O7.1.3.A The Installation will establish and maintain an environmental management system as described in ISO 14001-1996.
3 O7.1.4.A Installations must complete the DoD approved EMS implementation metrics no later than 31 December 2005.
4 O7.1.5.A Installations must develop an ISO 14001 conformant environmental policy statement, consistent with the Army EMS action memorandum, signed by the commander by 31 December 2005.
5 O7.1.6.A Installations must complete an installation-wide EMS self-assessment with appropriate documentation and brief the results to the commander.
6 O7.1.7.A Installations must complete a written EMS implementation plan with defined dates, identified resources, and organizational responsibilities for implementing a mission-advancing, ISO 14001?conformant EMS, signed by the commander.
7 O7.1.8.A Installations must compile a prioritized list of environmental aspects by 30 March 2005.
8 O7.1.9.A Installations must provide awareness-level training on the Army's EMS to all appropriate installation personnel by 31 December 2005.
9 O7.1.10.A The installation must complete at least one management review in accordance with the installation's documented policy for recurring internal EMS management reviews by 31 December 2005.
10 O7.1.11.A Each installation's EMS must focus on supporting and sustaining the installation's mission.
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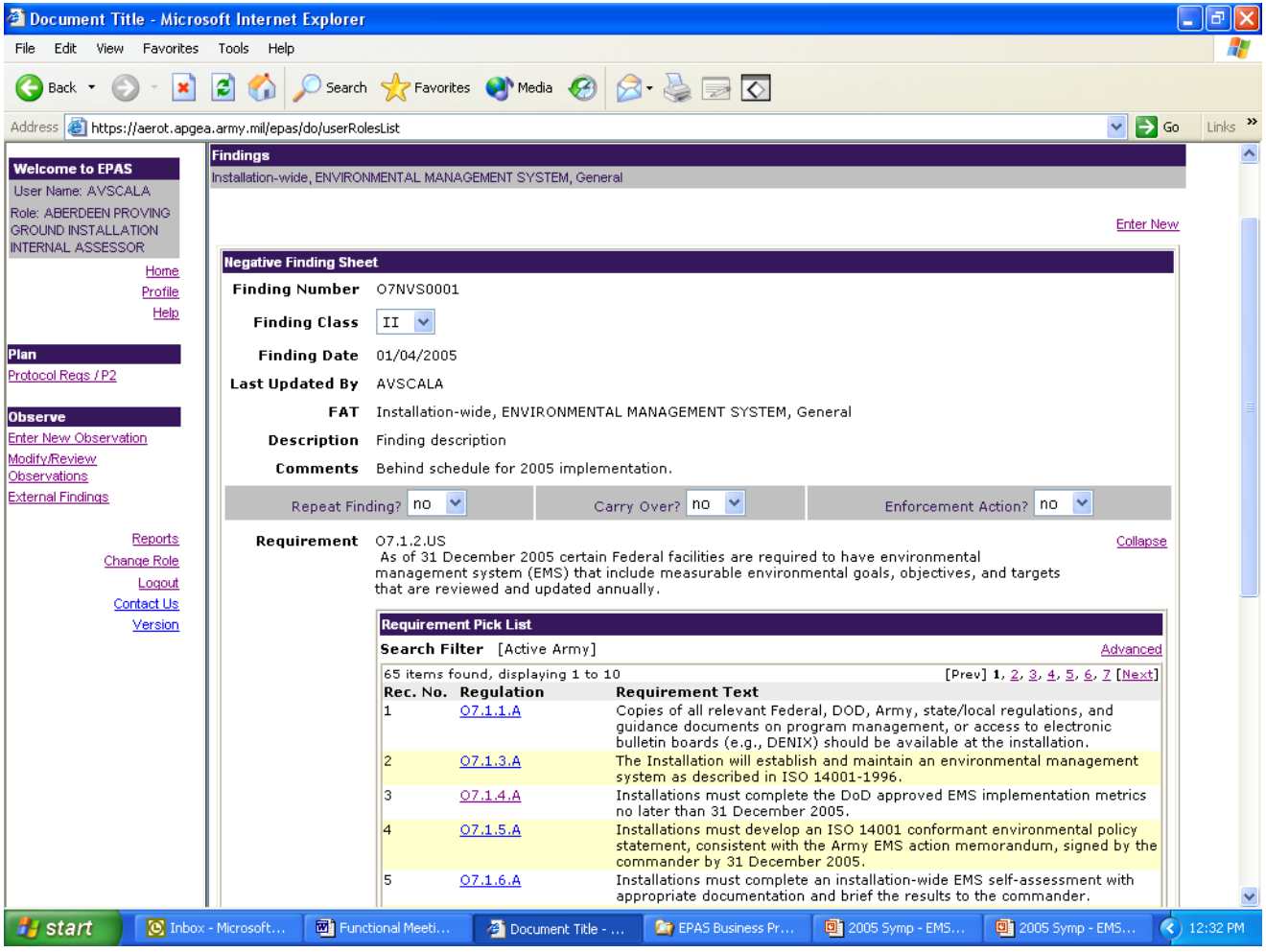
EMS Internal Auditing

Current EPAS Negative Finding Sheet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Welcome to EPAS
User Name: AVSCALA
Role: ABERDEEN PROVING GROUND INSTALLATION INTERNAL ASSESSOR
Home
Profile
Help
Plan
Protocol Reqs / P2
Observe
Enter New Observation
Modify/Review Observations
External Findings
Reports
Change Role
Logout
Contact Us
Version
Findings
Installation-wide, ENVIRONMENTAL MANAGEMENT SYSTEM, General
Enter New
Negative Finding Sheet
Finding Number O7NVS0001
Finding Class II
Finding Date 01/04/2005
Last Updated By AVSCALA
FAT Installation-wide, ENVIRONMENTAL MANAGEMENT SYSTEM, General
Description Finding description
Comments Behind schedule for 2005 implementation.
Repeat Finding? no
Carry Over? no
Enforcement Action? no
Requirement O7.1.2.US
As of 31 December 2005 certain Federal facilities are required to have environmental management system (EMS) that include measurable environmental goals, objectives, and targets that are reviewed and updated annually.
Collapse
Requirement Pick List
Search Filter [Active Army]
Advanced
65 items found, displaying 1 to 10
[Prev] 1, 2, 3, 4, 5, 6, 7 [Next]
Rec. No. Regulation Requirement Text
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EMS Internal Auditing

EMS Software Requirements

EPAS Compliance-driven	EMS Conformance-driven
Class I, II, or III	Conformance, Minor Non-Conformance, Major Non-Conformance
EPAR	EMS report
Corrective Actions Included	Corrective Actions determined by Installation

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EMS Internal Auditing

Summary

- Provided the EMS auditing plan for future years
- Explained how EPAS software will be modified to include EMS auditing capabilities

Resources

- Training
  - Joe Weihs – 410-436-6323
- Functionality
  - Matt Andrews: 410-436-1230
  - Nicole Kapolka: 410-436-1212
  - Nina Scala: 410-436-7073
- AEC Help Desk
  - 410-436-1244
  - USAECHelpDesk@aec.apgea.army.mil

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